

### REMARKS

Applicant has amended claims 1-28. Claim 29 has been added. This amendment is not related to patentability of the claims, nor made to overcome the rejection. The amendment of claims 1-17 and 21 changes means plus function expressions into expressions that are not limited by 35 USC 112, sixth paragraph. Applicant considers that the scope of the claims as filed is not limited to the teachings of the specification. For example, the schemes for detecting the screen angle of a scanned document are described in detailed at page 11, line 14 - page 15, line 16. However, persons of ordinary skill in the art could modify the device and software components described in the specification within the scope of this invention. Accordingly, applicant has amended the claims to include such modifications. The amendments of claims 5, 11, 16 and 22 also correct minor misspellings. The amendments to claims 26-28 change the expression "consists of" to "comprises" to present the limitations in an open-end format. Various other changes to the claims are for clarity and grammatical reasons only. None of the amendments above narrows the scope of the claims.

Applicant thanks the Examiner for indicating allowable subject matter.

Claims 1, 2, 7, 8, 13, 18, 19, 24 and 25 have been rejected under 35 USC as being unpatentable over the abstract of Japanese Laid-Open Patent Publication No. Hei. 6-178133 (Okimoto) in view of U.S. Patent No. 4,196,451 (Pellar). This rejection is respectfully traversed.

The image forming apparatus of claim 1 receives image data of a document having a screen angle, detects the screen angle of the documents, selects a dither pattern that has a screen angle different from that of the document, and prints the document image using the selected dither pattern, as set forth in claim 1 and described at page 7, lines 12-20 of the specification. Because the screen angle of the document that is printed by the image forming apparatus of

claim 1 is not the same as or similar to the screen angle of the document image received by this image forming apparatus, moiré interference does not occur. Accordingly, claim 1 as amended recites a detecting unit detecting a screen angle of the image data received by the image forming apparatus. This detecting unit is described for example, at page 11, line 16 - page 15, line 16 with reference to Figs. 4, 5A, 5B and 6A-6F.

Applicant has translated Okimoto in its entirety and submits the translation with this amendment. As understood from the translation, Okimoto's device detects the direction of a paper set on the device for printing and changes the screen angle for printing based on the detected direction of the paper when the device prints an image on the paper. The device is directed to printing an image with a screen angle that is proper for the paper orientation with respect to the image to be printed on the paper. Okimoto's device does not detect the screen angle of the document image to be printed on the paper. Furthermore, Okimoto does not even recognize moiré interference at all since Okimoto is concerned only with the screen angle at the time of printing but not the screen angle of the document image to be printed. Thus, Okimoto does not describe the detecting unit of claim 1.

Pellar does not overcome deficiencies of Okimoto. Accordingly, Okimoto and Pellar do not teach or suggest the image forming apparatus of claim 1 as a whole. Other independent claims 7, 13, 18 and 24 recite the same detecting unit as claim 1 or the corresponding detecting step.

Accordingly, the rejection of claims 1, 2, 7, 8, 13, 18, 19, 24 and 25 should be withdrawn.

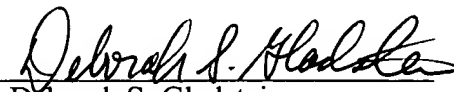
Newly added claim 29 recites a detecting unit, as recited in claim 1. Thus, claim 29 is allowable for the same reasons claim 1 is allowable.

In light of the above, a Notice of Allowance is solicited.

In the event that the transmittal letter is separated from this document and the Patent and Trademark Office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952, referencing Docket No. 325772012000.

Respectfully submitted,

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Enclosure: English translation of Japanese Laid-Open Patent Publication No. Hei. 6-178133  
(Okimoto)